

U.S. BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

FILED '20 MAR 6  
BANKR SD INDPMH3:37

IN RE: )  
 )  
ELLINGTON TRUCKING, LLC ) CASE NO. 17-00781-RLM-11  
 )  
17-00781-RLM-11 )

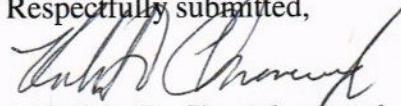
MOTION TO REINSTATE ECF PRIVILEGES

Comes now Robert D. Cheesebourough, counsel for Ellington Trucking, LLC, and moves the court for an order reinstating his electronic computer filing privileges and in support states as follows:

1. Counsel Cheesebourough was ordered to disgorge \$4150.00 in fees he received from his client Ellington Trucking, LLC during the course of his representation.
2. Appurtenant to said order Counsel Cheesebourough's ECF filing privileges were suspended by the court until the sum was paid in full.
3. Full payment of the ordered sum to Ellington Trucking has been made and no other amounts are due and owing at this time. A copy of the *Affidavit* produced by Sharon Harris, the *Stipulation of Settlement* entered into by Robert Cheesebourough and Ellington Trucking, and receipt of payment are attached.
4. Counsel Cheesebourough requires an immediate reinstatement of his ECF privileges to represent existing and future clients without hearing on the motion.
5. Counsel Cheesebourough has communicated with Harrison Strauss with the U.S. Trustee and informed him that full payment has been made.

WHEREFORE, Counsel requests that the court enter an order reinstating Robert Cheesebourough's ECF privileges immediately without hearing to expedite counsel's ability to represent other clients.

Respectfully submitted,

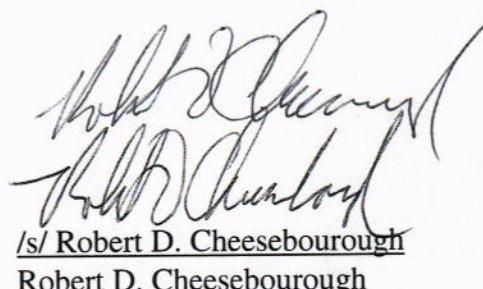


/s/ Robert D. Cheesebourough

Robert D. Cheesebourough  
5410 Tanglewood Lane  
Whitestown, Indiana 46075  
Ph. 317.374.4567  
[robertcheesebourough@gmail.com](mailto:robertcheesebourough@gmail.com)

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on this 6th day of March, 2020, the foregoing was filed and served upon the U.S. Trustee by first class U.S. mail, postage prepaid or by placement of the same in the U.S. Trustee's box at the clerk's office.

/s/ Robert D. Cheesebourough  
Robert D. Cheesebourough

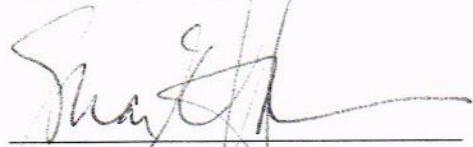
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

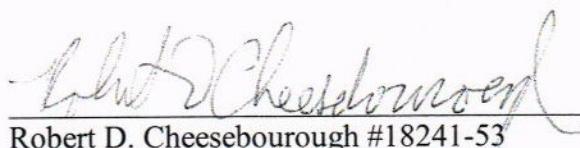
IN RE: ELLINGTON TRUCKING, LLC )  
  )  
  Case No. 17-00781-RLM  
Debtor.                               )  
  )

STIPULATION OF SETTLEMENT

It is hereby stipulated this 30th day of November 2018, by and between the above-referenced party and their legal counsel, Robert D. Cheesebourough ("Counsel"), that Counsel does owe and will pay to Ellington Trucking, LLC ("Ellington"), at 1829 Blankenship Drive, Indianapolis, Indiana 46217, the total sum of \$4,150.00 ("Total Sum"), to be paid with a credit given to Counsel for work already performed and due Counsel totaling \$950.00 and five monthly installment payments of Eight Hundred Dollars \$800.00 per month due on or before January 20, 2019, and payable on the 20<sup>th</sup> day of each month thereafter until such Total sum is paid in full, then Debtor shall enter the above-captioned matter as "SETTLED IN FULL" to this Court, Should Defendant default however on the payments(s) as herein provided, and fails to cure said defects within ten (10) days after associated written notice to Counsel at his address of record, then Counsel shall consent to a judgement in the amount of \$4,150.00, plus costs of any proceedings for collections, and less monies paid.

Agreed to hereby the Parties,

  
\_\_\_\_\_  
Ellington Trucking, LLC  
By, Sharon Harris, President  
1829 Blankenship Drive  
Indianapolis, Indiana 46217

  
\_\_\_\_\_  
Robert D. Cheesebourough #18241-53  
2272 Wynnendale Road  
Indianapolis, Indiana 46228

Save this Copy  
for your records.



326996

CASHIER'S CHECK - Customer Receipt

February 05, 2020

Pay to the

Order of: SHARON HARRIS\*\*\*

\$\*\*\*\*\*3,200.

Amount: THREE THOUSAND TWO HUNDRED 00/100 US DOLLARS

Memo: ELLINGTON TRUCKING DISGORGEMENT

Purchased by: ROBERT D CHEESEBOUROUGH

Transaction #: 13976214

NON-NEGOTIABLE

Cost Center: 4341

Method of Purchase: Cash/Check

The purchase of a Surety Bond may be required before any Cashier's Check on this bank will be replaced or refunded in the event it is lost, misplaced, or stolen.

U.S. Bankruptcy Court  
Southern District of Indiana  
Indianapolis Division

IN RE:

Ellington Trucking, LLC

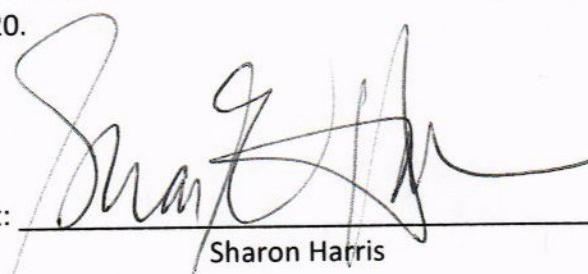
17-00781-RLM-11

AFFIDAVIT

I do swear and affirm under penalty of perjury that the following is true to the best of my understanding.

1. My name is Sharon Harris. I am the owner and President of Ellington Trucking, LLC.
2. I was represented by Robert D. Cheesebourough in the bankruptcy filed under the above listed case. Mr. Cheesebourough was ordered to repay me the \$4150.00 I paid him for legal services in this case.
3. On February 5, 2020, Mr. Cheesebourough made pay totaling \$3,200.00 to pay in full the balance owed.
4. The amounts I paid Mr. Cheesebourough are now repaid in full. There are no outstanding amounts owed to me by Mr. Cheesebourough.
5. I sent Harrison Strauss with the U.S. Trustee Office notice that Mr. Cheesebourough made the final payment on February 5, 2020.

Further affiant sayeth not.

Date: 3/6/2020 Signature of Affiant: 

Sharon Harris